



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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BY ECF

Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Natifah Cooper v. City of New York, et al., 14 CV 6136 (PKC) (RLM)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent the defendants in the above-referenced matter. I write pursuant to the Court's July 13, 2015 Order to provide the Court with a status letter regarding this matter. Defendants apologize to the Court for this late submission.

The parties have continued with discovery in this matter. Paper discovery is largely complete and only depositions remain. The parties are on pace to complete discovery within the deadline proscribed by the Court. The parties are attempting to resolve this matter before the parties begin depositions. To that end, the parties have engaged in extensive settlement negotiations. Plaintiff recently responded to defendants' counter offer and the parties are now within range to settle the matter. Defendants are now in the process of seeking additional authority in an attempt to resolve this matter. The parties are hopeful that the matter will be resolved within a week or two giving the relatively small gap.

The parties will continue with discovery with the hopes of settling this matter. If the parties, come to a resolution before the end of discovery, the parties will promptly notify the Court and file a stipulation of dismissal once the settlement documents are fully executed.

I thank the Court for its time and consideration.

Respectfully submitted,

/s/ Pernell Telfort

Pernell M. Telfort

cc: **BY ECF**
Robert Marinelli, Esq.